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GREYHOUND LINES, INC.,
FIRSTGROUP AMERICA, INC.

[ADDITIONAL COUNSEL CONTINUED ON NEXT PAGE]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NATIONAL FEDERATION OF THE
BLIND, on behalf of itself and all others
similarly situated; GREG DEWALL, on
behalf of himself and all others similarly
situated; RICHIE FLORES, on behalf of
himself and all others similarly situated;
MICHAEL HINGSON, on behalf of himself
and all others similarly situated;
MICHAEL RICHARDSON, on behalf of
himself and all others similarly situated; and
TINA THOMAS, on behalf of herself and all
others similarly situated,

Plaintiffs,

v.

GREYHOUND LINES, INC., and
FIRSTGROUP AMERICA, INC.,

Defendants.

Case No. 3:17-cv-03368-RS

**JOINT STIPULATION AND MOTION FOR
EXTENSION OF DEADLINES UNDER
GENERAL ORDER NO. 56 AND
SCHEDULING ORDER; ~~PROPOSED~~
ORDER**

Complaint Filed: June 12, 2017
Trial Date: None
District Judge: Hon. Richard Seeborg
Courtroom: 3, San Francisco

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NATIONAL FEDERATION OF THE BLIND,
12 GREG DEWALL, RICHIE FLORES,
MICHAEL HINGSON, MICHAEL RICHARDSON,
13 and TINA THOMAS

Pursuant to Civil Local Rule 7-11, plaintiffs National Federation of the Blind, Greg Dewall, Richie Flores, Michael Hingson, Michael Richardson, and Tina Thomas (collectively, "Plaintiffs"), on the one hand, and defendants Greyhound Lines, Inc. and FirstGroup America, Inc. (collectively, "Defendants"), on the other hand, by and through their respective counsel, hereby stipulate and move for administrative relief and an extension of the applicable deadlines in the Court's Scheduling Order (ECF No. 6) and General Order No. 56, as follows:

1. Plaintiffs have commenced an action on behalf of a putative class of individuals with visual disabilities, under the Americans with Disabilities Act and other laws, concerning the alleged inaccessibility of the website, www.greyhound.com, and a Greyhound mobile application.

2. The Court's scheduling order applying General Order No. 56 established the following deadlines:

- September 25, 2017 - Last day for parties and counsel to hold joint inspection of premises, with or without meet-and-confer regarding settlement.
- 28 days after Joint Site Inspection - Last day for parties to meet and confer in person to discuss settlement.
- 42 days after Joint Site Inspection - Last day for plaintiff to file a Notice of Need for Mediation.
- 7 days after mediation - Last day for plaintiff to file Motion for Administrative Relief Requesting Case Management Conference.

3. Defendants have proposed a limited extension of the deadlines in the Court's General Order No. 56 schedule based on the fact that the parties have already engaged in preliminary settlement discussions, that a third-party vendor retained by Defendants has commenced an assessment of the website at issue and advised that such assessment will not be completed until the end of November 2017, and that Defendants believe the proposed limited extension of the applicable deadlines under General Order No. 56 will assist the parties' ability to engage in meaningful settlement discussions.

4. Accordingly, the parties have agreed that the applicable deadlines in the Court's General Order No. 56 schedule should be extended as set forth below.

1 Therefore, IT IS HEREBY STIPULATED, AGREED AND REQUESTED by the parties,
2 subject to approval by the Court, that the parties' obligations under General Order No. 56 and the
3 Court's Scheduling Order in this matter shall be revised as follows:

- 4 (i) The last day for the parties to conduct the joint inspection and meet and confer
5 conference to discuss settlement shall be **October 25, 2017**.
- 6 (ii) The last day for filing the Notice of Need for Mediation shall be **October 26, 2017**.
- 7 (iii) The last day for the parties to conduct a mediation shall be **December 15, 2017**.
- 8 (iv) The last day for filing a Motion for Administrative Relief Requesting Case
9 Management Conference shall be **December 20, 2017**.

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12 DATED: September 22, 2017

Respectfully submitted,

OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.

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14
15 By: /s/
Cassandra Payton

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17 Attorneys for Defendants
18 GREYHOUND LINES, INC., and FIRSTGROUP
AMERICA, INC.

19
20 DATED: September 22, 2017

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23 By: /s/
Anna Levine

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25 Attorneys for Plaintiffs
26 NATIONAL FEDERATION OF THE BLIND,
27 GREG DEWALL, RICHIE FLORES, MICHAEL
28 HINGSON, MICHAEL RICHARDSON and
TINA THOMAS

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_____/s/_____
Cassandra Payton

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